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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

12 LESA, LLC, a Delaware limited liability
13 company,

14 Plaintiff;

15 v.

16 **FAMILY TRUST OF KIMBERLY AND ALFRED
MANDEL,**
17 **JAMES FISHER, an individual,**
18 **CHRISTINE WILLIAMS, an individual,**
19 **GREGORY ROSSMANN, an individual,**
20 **ALFRED MANDEL an individual,**
21 **ANDREW CHASE, an individual,**
22 and the **ANDREW CHASE 2005 REVOCABLE
TRUST UAD 3/29/05 AS AMENDED 5/10/20,**

23 Defendants.

Case No. 4:15-cv-05574-KAW

STIPULATION AND [PROPOSED] ORDER
ENLARGING TIME RE: HEARING ON
DEFENDANTS' MOTION TO DISMISS AND
PARTIAL SUMMARY JUDGMENT.

STIPULATION ENLARGING TIME RE: DEFENDANTS' MOTION TO DISMISS

This Stipulation is entered into by Plaintiff LESA, LLC and Defendants Family Trust of Kimberly and Alfred Mandel, Alfred Mandel, James Fisher, Christine Williams, Gregory Rossmann, Andrew Chase, and Andrew Chase 2005 Revocable Trust UAD 3/29/2005 as Amended 5/10/20 (collectively, "Defendants") by their respective counsel.

RECITALS

- A. Plaintiff LESA, LLC filed its Complaint on December 4, 2015 (Dkt. 1).
- B. Defendants filed their Motion to Dismiss Second Cause of Action of Second Amended Complaint for Failure to State a Claim (FRCP12(b)(6)) and Defendant Rossmann, Mandel, Fisher and Williams' Motion for Partial Summary Judgment on Third Cause of Action (FRCP 56) (the "Motion to Dismiss") on May 31, 2016 (Dkt. 33), set for hearing on September 1, 2016.
- C. Plaintiff filed its Opposition to Defendants' Motion on June 14, 2016 (Dkt. 49).
- D. Counsel for Plaintiff will not be available on September 1, 2016 for the Hearing on Defendants' Motion to Dismiss due to travel and other obligations.
- E. Counsel for Defendants will not be available on September 15, 2016.
- F. The Parties understand that the next available date for Law and Motion Hearing before the Honorable Kandis Westmore is November 3, 2016.

STIPULATION

To accommodate Counsel's various scheduling conflicts, the Parties hereby stipulate to modify the briefing schedule for the Motion as follows:

Hearing on Motion to Dismiss: Thursday, November 3, 2016

IT IS SO STIPULATED.

Dated: August 26, 2016

COMPUTERLAW GROUP LLP

By: /s/ Christopher Sargent

Jack Russo
Christopher Sargent

Attorneys for Plaintiff
LESA, LLC

1 Dated: August 26, 2016

ROYSE LAW FIRM, PC

2 By: /s/ Thomas Moore
3 Thomas Moore
Lisa M. Chapman

4 Attorneys for Defendants
5 ALFRED MANDEL, JAMES FISHER, CHRISTINE
WILLIAMS, & GREGORY ROSSMANN

6 Dated: August 26, 2016

7 WALL LAW FIRM

8 By: /s/ J. Joseph Wall, Jr.
J. Joseph Wall, Jr.

9 Attorney for Defendants
10 ANDREW CHASE & ANDREW CHASE 2005
REVOCABLE TRUST UAD

12 **ATTESTATION OF E-FILED SIGNATURE**

13 I, Christopher Sargent, am the ECF user whose ID and password are being used to file
14 this declaration. In compliance with Civil L.R. 5-1(i)(3), I hereby attest that Thomas Moore and
15 J. Joseph Wall, Jr. have concurred in this filing's content and has authorized this filing.

17 Dated: August 26, 2016

18 By: /s/ Christopher Sargent

Christopher Sargent

[PROPOSED] ORDER

Pursuant to Parties' Stipulation, Defendants' Motion to Dismiss hearing date is moved from September 1, 2016 to November 3, 2016.

SO ORDERED.

Dated: 8/25, 2016

Hon. Kandis A. Westmore
United States Magistrate Judge